

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

In re

CUSTOMS AND TAX ADMINISTRATION OF
THE KINGDOM OF DENMARK
(SKATTEFORVALTNINGEN) TAX REFUND
SCHEME LITIGATION

This document relates to: 19-cv-10713 (LAK)

MASTER DOCKET

18-md-2865 (LAK)

STIPULATION AND ~~PROPOSED~~ ORDER
REGARDING TIME TO ANSWER

Plaintiff Skatteforvaltningen (“SKAT”) and Defendants 2321 Capital Pension Plan, Bowline Management Pension Plan, California Catalog Company Pension Plan, Clove Pension Plan, Davin Investments Pension Plan, Delvian LLC Pension Plan, DFL Investments Pension Plan, Laegeler Asset Management Pension Plan, Lion Advisory Inc. Pension Plan, Mill River Capital Management Pension Plan, Next Level Pension Plan, Rajan Investments LLC Pension Plan, Spirit on the Water Pension Plan, and Traden Investments Pension Plan (together, the “**Plan Defendants**”) by and through their undersigned attorneys, hereby stipulate and agree as follows:

WHEREAS, on November 19, 2019, SKAT brought suit in this Court against the Plan Defendants. (Dkt. 1.)

WHEREAS, the Plan Defendants’ time to answer or otherwise move against the Complaint is April 20, 2020. (*See* Dkt. 45. Exhibits A, B, C & D.)

WHEREAS, on March 27, 2020, SKAT moved for leave to amend its Complaints in this multidistrict litigation and moved to make its Amended Complaints due 14 days after this Court granted the Motion for Leave to Amend. (Dkts. 50, 51.)

WHEREAS, on April 13, 2020, the Court granted SKAT's Motion for Leave to Amend (Dkt. 54), thus setting the deadline for SKAT to file its amended complaints on April 27, 2020.

WHEREAS, SKAT intends to file an Amended Complaint in this action on or before April 27, 2020.

NOW THEREFORE, the parties hereby stipulate and agree that the Plan Defendants need not answer or otherwise respond to SKAT's original Complaint and instead will answer or otherwise respond to the Amended Complaint.

Dated: New York, New York
April 16, 2020

AKIN, GUMP, STRAUSS, HAUER &
FELD LLP

By: /s/ Robert H. Pees
(e-signed with consent)
Robert H. Pees

One Bryant Park
Bank of America Tower
New York, New York 10036
Telephone: (212) 872-1072
Fax: (212) 872-1002
rpees@akingump.com

*Counsel for Defendants 2321 Capital
Pension Plan, Bowline Management Pension
Plan, and Lion Advisory Inc. Pension Plan*

HUGHES HUBBARD & REED LLP

By: /s/ Marc A. Weinstein
Marc A. Weinstein

One Battery Park Plaza
New York, New York 10004-1482
Telephone: (212) 837-6000
Fax: (212) 422-4726
marc.weinstein@hugheshubbard.com

*Counsel for Skatteforvaltningen (Customs and
Tax Administration of the Kingdom of
Denmark)*

LANKLER, SIFFERT & WOHL LLP

By: /s/ Gabrielle S. Friedman
(e-signed with consent)
Gabrielle S. Friedman

500 Fifth Avenue
New York, New York 10110
Telephone: (212) 921-8399
gfriedman@lswlaw.com

Authorized only to sign this stipulation on behalf of Defendants California Catalog Company Pension Plan, Davin Investments Pension Plan, DFL Investments Pension Plan, Laegeler Asset Management Pension Plan, Next Level Pension Plan, Rajan Investments LLC Pension Plan, and Spirit on the Water Pension Plan

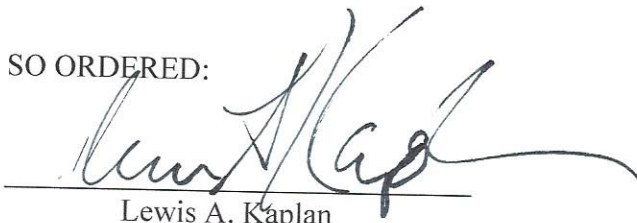
MORVILLO ABRAMOWITZ GRAND IASON & ANELLO PC

By: /s/ Richard D. Weinberg
(e-signed with consent)
Richard D. Weinberg

565 Fifth Avenue
New York, New York 100317
Telephone: (212) 880-9485
rweinberg@maglaw.com

Counsel for Defendants Clove Pension Plan, Delivan LLC Pension Plan, Mill River Capital Management Pension Plan, and Traden Investments Pension Plan

SO ORDERED:



Lewis A. Kaplan
United States District Judge

4/17/2020